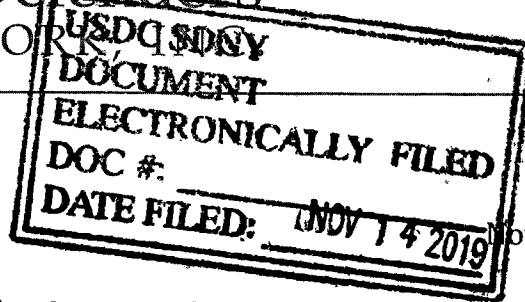


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November 13, 2019

VIA ECF

Honorable Judge George B. Daniels
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: **United States v. Oswaldo Morel-Garden,**
18 Cr. 230 (GBD)

SO ORDERED:

George B. Daniels
George B. Daniels, U.S.D.J.

Dated: **NOV 14 2019**

Dear Judge Daniels:

I write, with no objection from the Government and with no objection from Pretrial Services, to respectfully request that Mr. Morel-Garden's bail conditions be modified to remove the condition of curfew with electronic monitoring.

On February 22, 2018, Magistrate Judge Cott ordered Mr. Morel-Garden released with the following bail conditions, *inter alia*: a \$150,000 personal recognizance bond secured by two financially responsible persons; surrender of passport with no new applications; strict pretrial supervision; home detention with electronic monitoring; defendant to seek or continue employment. On September 12, 2018, Your Honor modified Mr. Morel-Garden's bail conditions from home detention to a curfew.

In the past year and nine months since his release on bail, Mr. Morel-Garden has been fully compliant with his bail conditions. He recently secured a new job opportunity, where his initial shift will be from 6pm to 6am six days a week. By removing the condition of curfew with electronic monitoring, Mr. Morel-Garden will be allowed the opportunity to gain additional work experience and better support himself financially. Assistant U.S. Attorney Ryan Finkel and Pretrial Services Officer Bernisa Mejia do not object to Mr. Morel-Garden's request.

Thank you for your consideration of this matter.

Respectfully submitted,
/s/ Jennifer Willis
Jennifer Willis, Esq.
Assistant Federal Defender
212-417-8743

CC: AUSA Ryan Finkel (by ECF)
PTSO Bernisa Mejia (by e-mail)